

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

<b>JUDY WETHINGTON, et al.,</b>	:	<b>Case No. C-1-01-441</b>
	:	
<b>Plaintiffs,</b>	:	<b>Judge Spiegel</b>
	:	
<b>vs.</b>	:	
	:	
<b>PURDUE PHARMA, L. P., et al.,</b>	:	
	:	
<b>Defendants.</b>	:	

**PLAINTIFFS' SUBMISSION OF NEW EXHIBIT  
IN SUPPORT OF MOTION FOR CLASS CERTIFICATION**

Subsequent to the hearing on class certification, Plaintiffs learned through press accounts that a former employee of Defendant Purdue Pharma L.P. ("Purdue") recently filed a wrongful termination action against Purdue. The action is for a variety of claims related to Purdue's conduct in manufacturing Oxycontin. Upon learning of the newly filed action, Plaintiffs obtained a copy of the complaint.

One of the claims in the complaint relates to Purdue's use of a form of Oxycodone HCL that dissolves in the human body at a potentially dangerous rate. According to the Plaintiff, a former Assistant Director at Purdue, the use of the form of Oxycodone HCL used by Purdue can contribute to "overdosing and potentially lead to addiction." Complaint at ¶ 8. A copy of the Complaint is attached as Exhibit "A". Plaintiffs submit this newly fled complaint as an

exhibit because it demonstrates that predominant common class wide issues concerning whether Oxycontin is a defective product.

Respectfully submitted,

/s/ Terrence L. Goodman

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### **CERTIFICATE OF SERVICE**

I certify that a copy of Plaintiffs' Submission of New Exhibit in Support of Motion for Class Certification was served by First Class United States Mail, postage prepaid and on the following counsel for Defendants this 8<sup>th</sup> day of September 2003:

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